

Person Filing: Quido Iannacone

Address (if not protected): 519 S. Pandora Dr.

City, State, Zip Code: Gilbert AZ.85296

Telephone: 4808928359

Email Address: bringbackjr@aol.com

Representing ☒ Self or ☐ Attorney for _____

Lawyer's Bar Number: _____

COPY

JUL 11 2022



CLERK OF THE SUPERIOR COURT
J. MARTINEZ
CLERK'S OFFICE ONLY

SUPERIOR COURT OF ARIZONA

IN _____ COUNTY

Quido Iannacone

Quido IANNAcone

Name of Plaintiff

I.B.E.W.

Case Number: _____

CV 2022-093018

Title: CIVIL COMPLAINT

Name of Defendant

International Brotherhood Of Electrical

Workers Pension Benefit Fund

Plaintiff hereby submits this complaint against Defendant(s) and alleges the following:

JURISDICTION and VENUE

1. The Superior Court in MARICOPA County has the legal authority to hear and decide this case because: *(Check all boxes that are true.)*

☒ The value of this case exceeds \$10,000 dollars.

☒ Replevin or other nonmonetary remedy will take place in MARICOPA County.

☒ The Plaintiff resides in Maricopa County.

☒ The Defendant resides in 900 Seventh St. NW Washington DC County. 2001

☒ The Defendant does business in Washington D.C. _____
County.

☐ The events, actions, or debts subject of this Complaint occurred in MANICOTA
County.

☒ Other reason: Defendant denied my claim for back pension payments owed .

DISCOVERY TIER

2. Pursuant to Arizona Rules of Civil Procedure, Rule 26.2 (c) (3), the Court should assign my case to the following tier based on the amount of damages I request.

☒ Tier 1 = Actions claiming \$50,000 or less in damages.

☐ Tier 2 = Actions claiming more than \$50,000 and less than \$300,000 in damages,

OR Actions claiming nonmonetary relief.

☐ Tier 3 = Actions claiming \$300,000 or more in damages.

PARTIES

3. The Plaintiff in this case is:

Quido Iannacone

4. The Defendant in this case is:

International brotherhood of electrical workers pension benefit fund

900 seventh ST NW Washington DC 20001

STATEMENT OF FACTS AND BREACH

Case Number: _____

5. Defendant has stopped my pension payment when I proceeded to establish my right to run for office in the I.B.E.W local 266 elections .
-
-

6. The I.B.E.W Classified me as working with the tools and therefore stopped my pension .

7. I am classified as an A-card member since I joined the I.B.E.W in Feb.1956

8. My pension dues is funded by my monthly payments with no contribution from the I.B.E.W

9. I have not worked since 2005.

10. The I.B.E.W waived my per-capita dues and made me a honorary of which I did not want
and did not give the option to maintain my union card.

(If you need more space, add an attachment labeled "Statement of Facts and Breach," and continue consecutive numbering.)

APPLICABLE LAW SUPPORTING CLAIMS

- () Action brought under Section 502[a] of ERISA

- ()

- ()

Case Number: _____

()

()

()

()

(If you need more space, add an attachment labeled "Applicable Laws Supporting Claims," and continue consecutive numbering.)

INJURIES

()

()

()

()

()

(If you need more space, add an attachment labeled "Injuries," and continue consecutive numbering.)

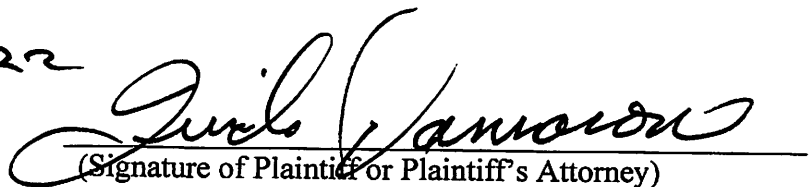
DEMAND FOR RELIEF

WHEREFORE, Plaintiff demands judgment against defendant(s), and each of them (if applicable) for the following dollars, interest, costs, and expenses incurred herein, or non-monetary remedy, including reasonable attorneys' fees, and for such other and further relief as the Court may deem just and proper.

- () Denied pension payments since March 1st. 2016 till present in the amount of 184.00 dollars a month.
- _____
- _____
- ()
- _____
- _____
- ()
- _____
- _____
- ()
- _____
- _____
- ()
- _____
- _____

(If you need more space, add an attachment labeled "Demand for Relief," and continue consecutive numbering.)

Dated this July 8th 2022
(Date of signature)


(Signature of Plaintiff or Plaintiff's Attorney)

In the Superior Court of the State of Arizona
In and For the County of _____

Case Number CV 2022-093018

CIVIL COVER SHEET- NEW FILING ONLY
(Please Type or Print)

Plaintiff's Attorney Self Guided Amador

Attorney Bar Number _____

Is Interpreter Needed? ☐ Yes ☒ No

If yes, what language(s): _____

COPY



JUL 11 2022

CLERK OF THE SUPERIOR COURT
V. MARTINEZ
DEPUTY CLERK

Plaintiff's Name(s): (List all) _____ Plaintiff's Address: _____ Phone #: _____ Email Address: _____

Guido IANNAONE 579 S. PANDORA DR 480 8928359
GILBERT AZ.

bringbackjr@aol.com

(List additional Plaintiffs on page two and/or attach a separate sheet).

Defendant's Name(s): (List All)

INTERNATIONAL Brotherhood of Electrical Workers
PENSION BENEFIT FUND

(List additional Defendants on page two and/or attach a separate sheet)

RULE 26.2 DISCOVERY TIER OR MONETARY RELIEF CLAIMED:

IMPORTANT: Any case category that has an asterisk (*) **MUST** have a dollar amount claimed or Tier selected. State the monetary amount in controversy or place an "X" next to the discovery tier to which the pleadings allege the case would belong under Rule 26.2.

☒ Amount Claimed \$ 15,456

☒ Tier 1

☐ Tier 2

☐ Tier 3

NATURE OF ACTION

Place an "X" next to the one case category that most accurately describes your primary case. Any case category that has an asterisk (*) **MUST** have a dollar amount claimed or Tier selected as indicated above.

100 TORT MOTOR VEHICLE:

☐ 101 Non-Death/Personal Injury*

☐ 102 Property Damage*

☐ 103 Wrongful Death*

110 TORT NON-MOTOR VEHICLE:

- ☐ 111 Negligence*
☐ 112 Product Liability – Asbestos*
☐ 112 Product Liability – Tobacco*
☐ 112 Product Liability – Toxic/Other*
☐ 113 Intentional Tort*
☐ 114 Property Damage*
☐ 115 Legal Malpractice*
☐ 115 Malpractice – Other professional*
☐ 117 Premises Liability*
☐ 118 Slander/Libel/Defamation*
☒ 116 Other (Specify) ERISA 502(a)

120 MEDICAL MALPRACTICE:

- ☐ 121 Physician M.D.* ☐ 123 Hospital*
☐ 122 Physician D.O.* ☐ 124 Other*

130 & 197 CONTRACTS:

- ☐ 131 Account (Open or Stated)*
☐ 132 Promissory Note*
☐ 133 Foreclosure*
☐ 138 Buyer-Plaintiff*
☐ 139 Fraud*
☐ 134 Other Contract (i.e. Breach of Contract)*
☐ 135 Excess Proceeds-Sale*
☐ Construction Defects (Residential/Commercial)*
 ☐ 136 Six to Nineteen Structures*
 ☐ 137 Twenty or More Structures*
☐ 197 Credit Card Debt (Maricopa County Only)*

150-199 OTHER CIVIL CASE TYPES:

- ☐ 156 Eminent Domain/Condemnation*
☐ 151 Eviction Actions (Forcible and Special Detainers)*
☐ 152 Change of Name
☐ 153 Transcript of Judgment
☐ 154 Foreign Judgment

- ☐ 158 Quiet Title*
☐ 160 Forfeiture*
☐ 175 Election Challenge
☐ 179 NCC-Employer Sanction Action (A.R.S. §23-212)
☐ 180 Injunction against Workplace Harassment
☐ 181 Injunction against Harassment
☐ 182 Civil Penalty
☐ 186 Water Rights (Not General Stream Adjudication)*
☐ 187 Real Property *
☐ Special Action against Lower Courts
 (See Lower Court Appeal cover sheet in Maricopa)
☐ 194 Immigration Enforcement Challenge
 (A.R.S. §§1-501, 1-502, 11-1051)

150-199 UNCLASSIFIED CIVIL:

- ☐ Administrative Review
 (See Lower Court Appeal cover sheet in Maricopa)
☐ 150 Tax Appeal
 (All other tax matters must be filed in the AZ Tax Court)
☐ 155 Declaratory Judgment
☐ 157 Habeas Corpus
☐ 184 Landlord Tenant Dispute – Other*
☐ 190 Declaration of Factual Innocence (A.R.S. §12-771)
☐ 191 Declaration of Factual Improper Party Status
☐ 193 Vulnerable Adult (A.R.S. §46-451)*
☐ 165 Tribal Judgment
☐ 167 Structured Settlement (A.R.S. §12-2901)
☐ 169 Attorney Conservatorships (State Bar)
☐ 170 Unauthorized Practice of Law (State Bar)
☐ 171 Out-of-State Deposition for Foreign Jurisdiction
☐ 172 Secure Attendance of Prisoner
☐ 173 Assurance of Discontinuance
☐ 174 In-State Deposition for Foreign Jurisdiction
☐ 176 Eminent Domain– Light Rail Only*
☐ 177 Interpleader– Automobile Only*
☐ 178 Delayed Birth Certificate (A.R.S. §36-333.03)
☐ 183 Employment Dispute– Discrimination*

☐ 185 Employment Dispute-Other*

☐ 163 Other* _____

☐ 196 Verified Rule 45.2 Petition

(Specify)

☐ 195(a) Amendment of Marriage License

☐ 195(b) Amendment of Birth Certificate

EMERGENCY ORDER SOUGHT

☐ Temporary Restraining Order

☐ Provisional Remedy

☐ OSC

☐ Election Challenge

☐ Employer Sanction

☐ Other (Specify) _____

COMMERCIAL COURT (Maricopa County Only)

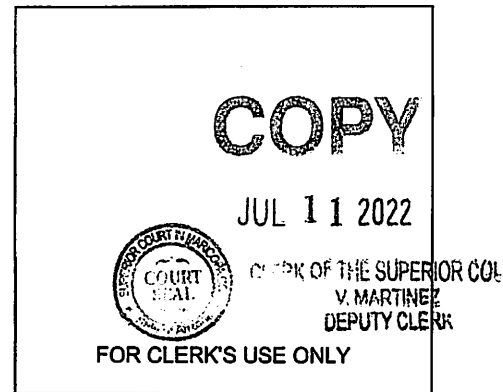
☐ This case is eligible for the Commercial Court under Rule 8.1, and Plaintiff requests assignment of this case to the Commercial Court. More information on the Commercial Court, including the most recent forms, are available on the Court's website at:

<https://www.superiorcourt.maricopa.gov/commercial-court/>

Additional Plaintiff(s):

Additional Defendant(s):

Person Filing: Guido IANNACONE
Address (If not protected): 5795 PANDORA DR.
City, State, Zip Code: GILBERT AZ 85296
Telephone: 480-892-8359
Email Address: BRIAN@PAKTR3.COM
Lawyer's Bar Number: _____
Representing ☒ Self, without a Lawyer or ☐ Attorney for ☐ Plaintiff OR ☐ Defendant



**SUPERIOR COURT OF ARIZONA
IN MARICOPA COUNTY**

Guido IANNACONE

PLAINTIFF,

CV2022-093018

Case Number: _____

**CERTIFICATE OF COMPULSORY
ARBITRATION**

VS.

INTERNATIONAL BROTHERHOOD of ELECTRICAL WORKERS
PENSION BENEFIT FUND
DEFENDANT.

***Notice to Defendant: If you agree with the Plaintiff's Certificate of Compulsory Arbitration, you DO NOT need to file this form.**

- The undersigned certifies that this case is (Please check **ONLY** one option below):
- ☐ **Subject to Arbitration** – The amount of money in controversy **DOES NOT** exceed \$50,000, **AND** no other affirmative relief is sought.
- ☐ **Not Subject to Arbitration** – The amount of money in controversy **DOES** exceed \$50,000, **OR** other affirmative relief is sought.

***Defendant – If you DISAGREE with the Plaintiff's Certificate of Compulsory Arbitration, please explain why you disagree below:**

SUBMITTED this _____ day of _____, 20____.

SIGNATURE _____